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May 21, 2015

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004-1408
gerber.chambers@nysb.uscourts.gov

**Re: In re Motors Liquidation Company, et al., Case No. 09-50026 (REG);
*Sesay et al v. General Motors et al, 1:14-06018 (JMF); Elliott, et al. v. General
Motors LLC, et al., 1:14-cv-8382-JMF; Sesay et al. v. General Motors LLC et al.,
1:14-cv- 0618-JMF; Bledsoe et al. v. General Motors LLC, 1:14-cv-7631-JMF***

Your Honor:

I represent Counsel Celestine Elliott, Lawrence Elliott, Berenice Summerville, Ishmail Sesay, Joanne Yearwood, Sharon Bledsoe, Tina Farmer, Paul Fordham, Momoh Kanu, Tynesia Mitchell, Dierra Thomas and James Tibbs, plaintiffs in the above captioned actions.

On their behalf, I write to request that the Court grant leave for Plaintiffs to submit a response to Mr. Steinberg's letter submitted to the Court earlier today regarding the Court's consideration of additional objections from parties other than the "Identified Parties" to New GM's Motion to Enforce. In the event the Court denies this leave, Plaintiffs respectfully alternatively request an opportunity to submit objections to the proposed judgments that Designated Counsel and New GM have submitted, each of which purport to affect their interests. Plaintiffs propose that such response or objections be submitted by May 28, 2015.

Plaintiffs seek an opportunity to make clear that they do not seek to relitigate any issue upon which the Court has ruled, but rather the opportunity to present distinct and additional grounds for the denial of New GM's Motions, in whole or part, to present reasons that have not been brought to the Court's attention why this Court lacks the constitutional authority to enter the judgment that GM proposes, and appropriately to preserve their full grounds for appeal.

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Please feel free to contact me if you have any questions.

Respectfully submitted,
/s/ Gary Peller
Gary Peller

cc: Arthur Steinberg, Esq.